## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	
v.	) CRIMINAL NO. 21-cr-10104-PBS
VLADISLAV KLYUSHIN Defendant	)· )·

## FORMALLY RENEWED WRITTEN MOTION FOR ACQUITTAL

At the Court's suggestion, defendant Vladislav Klyushin formally renews in writing his oral Fed. R. Crim. P. 29(a) motion for judgment of acquittal, made at the close of the government's case and renewed at the close of all evidence, on the grounds that the evidence, viewed most favorably to the government, failed to establish (a) any and all elements of the charged offenses beyond a reasonable doubt, (b) the same single conspiracy alleged in the indictment and (c) venue in this District.

Respectfully submitted,

Vladislav Klyushin, By His Attorneys,

## /s/ Maksim Nemtsev

Maksim Nemtsev, Esq. Mass. Bar No. 690826 20 Park Plaza, Suite 1000 Boston, MA 02116 (617) 227-3700 menemtsev@gmail.com

## /s/ Marc Fernich

Marc Fernich Law Office of Marc Fernich 800 Third Avenue Floor 20 New York, NY 10022 212-446-2346

DEVICED.